

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11924-RGS

IAN J. BROWN, JAMES
BROWN, and BARBARA
BROWN,
Plaintiffs,

v.

UNITED STATES OF
AMERICA, VERIZON NEW
ENGLAND, INC., and
BOSTON EDISON COMPANY
d/b/a NSTAR ELECTRIC,
Defendants.

**PLAINTIFFS' MOTION TO EXTEND TIME FOR FILING THEIR OPPOSITION
TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT [ASSENTED TO]**

Now come the plaintiffs IAN J. BROWN, JAMES BROWN, and BARBARA BROWN, and move the Court to extend for a period of twenty-one days the time within which they must file their Oppositions to Defendants' three separate motions for Summary Judgment.

As grounds therefore plaintiffs state as follows:

1. On March 14, 2007, each of the three Defendants – UNITED STATES OF AMERICA, VERIZON NEW ENGLAND, INC. AND BOSTON EDISON COMPANY, d/b/a NSTAR ELECTRIC – independently filed Motions for Summary Judgment;
2. These dispositive motions are complex, and will involve significant

expenditure of time on the part of Plaintiffs' counsel in order to properly research and draft Opposition to each of these three motions;

3. The Defendants have kindly assented to this motion, and do not claim any prejudice will result from the granting of this extension of time.

WHEREFORE, Plaintiffs IAN J. BROWN, JAMES BROWN, and BARBARA BROWN move the Court to grant them a twenty-one day extension of the deadline for filing their Opposition to each Defendant's Motion for Summary Judgment, until April 18, 2007.

Respectfully submitted,

The Plaintiffs,
By their attorney

/s/ Scott E. Charnas
Scott E. Charnas, BBO# 081240
Manheimer & Charnas, LLP
210 Commercial Street
Boston, MA 02109
617-557-4700

ASSENTED TO:

The Defendant,
Verizon New England, Inc.
By its attorney,

/s/ Joshua A. Lewin
William Worth, BBO# 544086
Joshua A. Lewin, BBO#658299
Prince, Lobel, Glovsky & Tye, LLP
100 Cambridge Street, Ste. 2200
Boston, MA 02214
617-456-8000

The Defendant,
Boston Edison Company,
d/b/a NSTAR Electric
By its attorney,

The Defendant,
United States of America,
By its attorney,

/s/ Michael K. Callahan
Michael K. Callahan, BBO# 546660
NSTAR Electric & Gas Corporation
800 Boylston Street, 17th Floor
Boston, MA 02109
617-424-2102

/s/ Anita Johnson
Anita Johnson
Assistant US Attorney
Moakley Federal Courthouse
One Courthouse Way, Suite 9200
Boston, MA 02210
617-748-3100

Dated: March 21, 2007

CERTIFICATE OF SERVICE

I, Scott E. Charnas, hereby certify that on the 21st day of March, 2007, I caused a copy of the foregoing to be served, by electronic filing and by first class mail, postage prepaid, upon Anita Johnson, Esquire, Assistant United States Attorney, Moakley Federal Courthouse, One Courthouse Way, Suite 9200, Boston, Massachusetts 02210, Joshua A. Lewin, Esquire, Prince, Lobel, Glovsky & Tye, LLP, 100 Cambridge Street, Boston, Massachusetts 02214, and Michael K. Callahan, Esquire, NSTAR Electric & Gas Corporation, Prudential Tower, 800 Boylston Street, 17th Floor, Boston, Massachusetts 02109.

/s/ Scott E. Charnas
Scott E. Charnas